

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIMOTHY KENNEDY

Plaintiff

Index No. 07 cv 10622 (NRB)(DFE)

ECF Case

-against-

THE CITY OF NEW YORK;
N.Y.P.D. OFFICER JUAN RODRIGUEZ
badge 10703;
N.Y.P.D. OFFICER JEFFREY HUNOLD
badge 8378;
N.Y.P.D. OFFICERS DOE ONE AND TWO,
not yet identified.

Defendants

PLAINTIFF'S RESPONSE TO
DEFENDANTS' FIRST SET OF
INTERROGATORIES AND
REQUEST FOR DOCUMENTS

Plaintiff TIMOTHY KENNEDY by his attorneys, The Law Office of Ronald L. Kuby, hereby responds to defendants' for disclosure demands, dated March 26, 2008.

Interrogatories

1. Witnesses. Holly Roldman and Arnon Klein, both residents at 230 W. 82nd Street, NY, NY 10024
2. Statements by NYC & agents. Memo book entries, aided reports, and the like.
3. Documents prepared by NYC & agents. Memo book entries, aided reports, and the like.
4. Injuries claimed. Subsequent hospitalization; two diagnostic spinal taps; continuing head pains, continuing stress, sleep disorder, temporary 100-point reduction in T-cell count and weight loss.
5. Economic injuries claimed. Loss of employment, design of decor for

dinner party scheduled for the day following the incident. Estimated loss \$10,000. Loss or reduction in value, jewelry and clothing damaged during incident.

6. Employers for past 10 years. Self employed as independent contractor for such companies and individuals as Ashton-Drake (subsidiary of Bradford Exchange), Niles, IL.; William Paley, Peter Sharpe, Kaye Ballard.

7. Medical providers past 10 years. St. Lukes - Roosevelt Hospital (releases previously provided); no other providers.

8. Worker's compensation past 10 years. None.

9. Social Security Disability past 10 years. SSI (NY State) since July 2004.

10. Medicare / Medicaid applications past 10 years. Medicaid (NY State) since July 2004.

11. Insurance claims past 10 years. None.

12. Government agencies to whom plaintiff complained. None.

13. Prior arrests. Plaintiff has been arrested three times before the subject incident. All charges in each case were dismissed, and the records sealed.

14. Convictions. None.

15. Law suits to which plaintiff has been a party. One law suit against City of New York and police officers (plaintiff does not recall particulars) circa 1995. Settled.

16. Testimony or statements by plaintiff re instant action. Plaintiff spoke about the incident at a forum on police brutality held at New York University, September 28, 2007.

17. Treating Physicians plaintiff intends to call at trial. Dr. Nancy Murphy and Dr. Vani Ghandi, both with St. Lukes - Roosevelt Hosp.

18. Expert witnesses. None identified to date.
19. Documents prepared by or for plaintiff. None, other than pleadings.
20. FIO requests. None.

Document requests

1. Documents identified in above interrogatories. No responsive documents in plaintiff's possession. Plaintiff will secure and produce photographs and descriptions of damaged property.
2. Documents regarding the incident. None.
3. Medical records. Plaintiff has provided releases and waivers for such records. Providing records would be duplicative, however plaintiff will produce copies of same if necessary.
4. Photographs and AV material. A photograph was produced with plaintiff's initial disclosures. Additional photographs will be produced when made.
5. Documentation of damages. To be produced under separate cover. See responses to doc. request 1 & 4, above.
6. Subpoenas. None to date.
7. Responses to subpoenas. None to date
8. Responses by government agencies to complaints. None
9. Tax returns. Plaintiff has not filed taxes since the year 2000.
10. Expert disclosures. Experts have not been selected. Plaintiff will supplement as appropriate.
- 11 - 18. Authorizations. Produced herewith as appropriate.

New York, New York
March 31, 2008

/s/
George Wachtel [GW5921]
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